

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

LASHAWN SHARPE, JIM CASTORO
and STEVE DAILEY, individually and on
behalf of all others similarly situated,

Plaintiffs,

-against-

A & W CONCENTRATE COMPANY and
KEURIG DR PEPPER,

Defendants.

Case No.: 1:19-cv-00768-BMC

**FEDERAL CIVIL PROCEDURE RULE 23(e)(3) STATEMENT AND AGREEMENT
BETWEEN CLASS COUNSEL AND DEFENDANTS REGARDING CLASS COUNSEL'S
FEES AND EXPENSES**

Class Counsel Reese LLP and Sheehan & Associates, P.C. (“Class Counsel”) and defendants A&W Concentrate Company and Keurig Dr Pepper (“Defendants”) hereby agree that Class Counsel will move for \$3,225,000 for Class Counsel’s fees and expenses and that Defendants will not oppose Class Counsel’s motion for that amount.

AGREED TO THIS 17th DAY of AUGUST, 2023 BY:

REESE LLP

/s/ Michael R. Reese
Michael R. Reese

SHEEHAN & ASSOCIATES, P.C.

/s/ Spencer Sheehan
Spencer Sheehan

Class Counsel

GIBSON, DUNN & CRUTCHER LLP

/s/ Russell H. Falconer
Russell H. Falconer

Counsel for Defendants and on behalf of Defendants